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March 3, 2000

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MAR 03 2000

Ms. Magalie Roman Salas
Secretary, Federal Communication Commission
445 12th Street, S.W.
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Ex Parte Presentation of Covad Communications Company in CC
Docket No. 00-4, *Application by SBC Communications Inc., et. Al.
For Provision of In-Region, InterLATA Services in Texas*

Dear Ms. Salas,

On the afternoon of March 2, 2000, Thomas M. Koutsky of Covad
Communications Company had a telephone conference with John Reel of the Common
Carrier Bureau, Policy Division. During this conversation, Mr. Reel requested that
Covad provide the Commission a copy of the draft DSL performance measurements
recently filed by Covad, Rhythms and SWBT to the Texas Commission's order in Texas
PUC Dockets Nos. 20226 and 20272 (the "DSL Arbitration").[1]

The filings by Covad, Rhythms and SWBT make it clear that the performance
measurements relied upon by SWBT in this application are simply inadequate for xDSL-
related issues. Particularly telling is SWBT's admission that its FOC measurement "was
prompted by comments filed by a number of parties with the Federal Communications
Commission in CC Docket No. 00-4" (Attachment B, at 2). In fact, SWBT's proposed
FOC measurement contains the following, rather telling, moniker:

> THIS IS A PRELIMINARY COPY.
> MORE DETAILS TO BE WORKED OUT LATER[2]

This statement is a clear admission by SWBT that its performance measurements
regarding xDSL-capable loops are simply "not ready for prime time."

In addition, SWBT's proposed performance measurement for PM 55.1 effectively
admits that SWBT requires CLECs to change the "due date" for entire categories of
xDSL loop orders.[3] The SWBT proposed Business Rule for PM 55.1 states:

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[1]   The joint Covad/Rhythms redlined proposal filed on February 21, 2000 is attached as Attachment
A. SWBT's Proposed Performance Measures, filed on the same day, is attached as Attachment B.

[2]   Attachment B at 5.

[3]   Covad witness Michael Smith described this process in his declaration, ¶¶ 13-22. Covad
requested that this system be changed on October 11, 1999. Michael Smith Decl. ¶ 22.

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If the loop in its current condition does not meet the CLEC's specifications,[4] SWBT will reject the LSR back to the CLEC and wait for a supplement from the CLEC notifying SWBT of the appropriate action to take. If the CLEC supplements the LSR to order the DSL, SWBT will issue the order *and the Application Date will be the date that SWBT receives the supplement.*

Thus, SWBT has effectively conceded that it assigns new due dates for xDSL loop orders in PM 55.1 because of this Byzantine "reject-supplement" process.

FCC staff has also asked that Covad provide updates with regard to the DSL Arbitration and other related matters. On February 29, 2000, SWBT filed with the Texas Commission a motion for rehearing of the DSL Arbitration Award (Attachment C). In this motion for rehearing, SWBT requested that the Texas Commission backslide on the three-day interval for return of loop qualification information. In particular, SWBT asked that the Texas Commission "review additional information available to it as to SWBT's ability to return loop make-up information within three business days and change these intervals to the three-to-five business day interval combined with a parity obligation" (Attachment C at 3, emphasis deleted).

Since SWBT has argued that its DSL loop installation intervals must be extended by the loop qualification interval, this motion must be seen for what it is: a request that the Commission extend SWBT's xDSL-capable loop installation interval by two business days. At this stage of SWBT's 271 application, this last-minute gambit to justify SWBT's poor performance record should not be tolerated.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.206(a)(2) of the Commission's rules.

Sincerely,

Thomas M. Koutsky

cc: John Reel, Common Carrier Bureau
        Audrey Wright, Common Carrier Bureau
        Bill Dever, Common Carrier Bureau
        Jessica Rosenworcel
        Katherine Farroba, Texas PUC (via FedEx)
        Luin Fitch, DOJ
        ITS

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[4]   That is, the loop needs conditioning or the loop does not meet SWBT's loop qualification criteria for ADSL service. As described by Covad witness Michael Smith, in the Reconciled Data set, 73% of Covad's "one-step" orders for ADSL and SDSL services were initially rejected by SWBT due to this engineering review. Michael Smith Decl. ¶ 30.

/¬Hachment /¬

Appendix – Performance Measurements and Business Rules
Rhythms and Covad Proposed Performance Measurements
February 22, 2000

PERFORMANCE MEASUREMENTS
RESALE POTS, RESALE SPECIALS AND UNES
Pre-Ordering/Ordering

1. Measurement
Average Response Time For OSS Pre-Order Interfaces
Definition:
The average response time in seconds from the SWBT side of the Remote Access Facility (RAF) and return for pre-order interfaces (Verigate, DataGate and EDI where the pre-order functionality is integrated) by function.
Exclusions:
None
Business Rules:
The clock starts on the date/time when the request is received by SWBT, and the clock stops on the date/time when SWBT has completed the transmission of the response to the CLEC. Timestamps are taken at the DataGate and Verigate servers and do not include transmission time through the LRAF. Response time is accumulated for each major query type, consistent with the specified reporting dimension, and then divided by the associated total number of queries received by SWBT during the reporting period. The response time is measured only within the published hours of interface availability. Published hours of interface availability are documented on the CLEC web site. (SWBT will not schedule system maintenance during normal business hours (8:00 a.m. to 5:30 p.m. Monday through Friday).[1]
Levels of Disaggregation:
• Address Verification • Request For Telephone Number • Request For Summary Customer Service Record (CSR) < = 30 WTNs (Also broken down for Lines as required for DIDs). • Request For Summary Customer Service Record (CSR) > 30 WTNs (Also broken down for Lines as required for DIDs). • Request for Detailed Customer Service Request (CSR) • Service Availability • Service Appointment Scheduling (Due Date)

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[1] The Department of Justice noted that in the data provided measuring the time SWBT provides loop make-up information, SWBT incorrectly measured only the time that the SWBT internal representative worked on the request and excluded the time before the SWBT representative worked on the request and the time that the request remained with SWBT after the work was completed. *See* In the Matter of Application by SBC Communications, Inc., *et al.*, for Provision of In-Region, InterLATA Services in Texas, CC Docket No. 00-4, *Evaluation of the United Stated Department of Justice* (rel. Feb. 14, 2000)("DOJ Evaluation"). The Business Rule for measuring this process, as found in this Performance Measurement, is accurate to properly measure the entire process. SWBT should be ordered to implement this Performance Measurement consistent with the Business Rule.

- Dispatch Required
- PIC
- Mechanized pre-qualification system for DSL Orders
- Manual Loop Makeup Information for DSL Orders
- Mechanized Loop Makeup Information for DSL Orders

Calculation:	Report Structure:
Σ[(Query Response Date & Time) - (Query Submission Date & Time)] ÷ (Number of Queries Submitted in Reporting Period)	Reported on a CLEC, SWBT DSL Affiliate, and all CLECs basis by interface for EDI, DATAGATE and VERIGATE.

Measurement Type:

Tier 1 – Low
Tier 2 – Medium

Benchmark:

Benchmarks for summary CSR applies to < = 30 WTNs. Benchmarks for diagnostic measurements will be evaluated at the six months review.

Measurement	Fax/LEX	EDI/Datagate	Verigate
Address Verification	NA	4.7 seconds	4.7 seconds
Request For Telephone Number	NA	4.5 seconds	4.5 seconds
Request For Customer Service Record (CSR)	NA	6.6 seconds	6.6 seconds
Service Availability	NA	6.6 seconds	6.6 seconds
Service Appointment Scheduling (Due Date)	NA	1.0 second	1.0 second
Dispatch Required	NA	12.6 seconds	12.6 seconds
PIC	NA	28.0 seconds	To be determined at six month revision period

Mechanized loop pre-qualification process	4 business hours	6.6 seconds[2]	6.6 seconds[3]
Manual Loop Makeup Information	3 business days	3 business days[4]	3 business days[5]
Mechanized Loop Makeup Information	3 business days	6.6 seconds[6]	6.6 seconds[7]

[2] This interval is for CLEC requests for those central offices that have been inventoried. At the time that the electronic interface for loop makeup information is implemented, as ordered by the Commission, then the Benchmark should be 6.6 seconds. In the event that SWBT provides loop-prequalification in a shorter time frame, then the benchmark should be at the shorter interval.

[3] This interval is for CLEC requests for those central offices that have been inventoried. At the time that the electronic interface for loop makeup information is implemented, then the Benchmark should be 6.6 seconds. In the event that SWBT provides loop-prequalification in a shorter time frame, then the benchmark should be at the shorter interval.

[4] The time interval for providing manual loop makeup information should be shorter. The interval contained in this measurement is consistent with the Arbitration Award. The standard should be the benchmark or parity with SWBT DSL Retail or SWBT DSL Affiliate, whichever is shorter.

[5] See comment in Footnote 4.

[6] *See* Rhythms/SWBT DSL **Attachment** Pursuant to Arbitration Award in 20226/20272. § 6.2.4; Covad/SWBT DSL **Attachment, § 5.4**: Once the electronic interfaced loop makeup system is implemented, the Benchmark should be equal to that already established for Request for Customer Service Record.

[7] *See* comment in Footnote 6.

1.1. Measurement
Percent of Loop Makeup Responses Rejected by Response Type

Definition:
The percent of DSL actual Loop Makeup Requests for which SWBT issues a reject notice, requiring the CLEC to supplement the original order, by pre-order interfaces (Verigate, DataGate, and EDI where the pre-order functionality is integrated), or manual processes, disaggregated by response type.

Exclusions:
None

Business Rules:
The percent of DSL actual Loop Makeup Requests that is rejected (*i.e.*, require a CLEC to submit a supplemental order) to CLEC disaggregated by response type, *e.g.*, denied for pair gain, needed conditioning, "non-standard loop".

Levels of Disaggregation:
• For manual DSL Loop Makeup Information – disaggregated by reasons for rejection.
• For mechanized DSL Loop Makeup Information – disaggregated by reasons for rejection.

Calculation:	**Report Structure:**
(# of rejected orders within each time interval ÷ total responses) * 100	Reported on a CLEC, all CLEC, and SWBT DSL Affiliate basis.

Measurement Type:
Tier 1 – Low
Tier 2 – Medium

Benchmark:
Parity with SWBT DSL Retail, SWBT DSL Affiliate, or other CLECs, whichever is less.

1.2.   Measurement

Accuracy of Actual Loop Makeup Information Provided for DSL Orders

Definition:

The percent of accurate DSL actual Loop Makeup Information provided to the CLEC.

Exclusions:

None

Business Rules:

This measurement compares the accuracy of the actual loop makeup information provided to the CLEC with the actual loop makeup as shown by SWBT's engineering work confirmation/design layout records (DLR).

Levels of Disaggregation:

- DSL actual Loop Makeup Information provided manually
- DSL actual Loop Makeup Information provided electronically

Calculation:	Report Structure:
(# of orders for which Loop makeup information provided by SWBT is identical to engineering work confirmation/DLR ÷ total actual Loop Makeup Information responses) * 100	Reported on a CLEC, all CLECs, SWBT DSL affiliate, and SWBT DSL Retail basis by interface for EDI, DATAGATE, VERIGATE, or manually, depending on method of provision of actual loop makeup information.

Measurement Type:

Tier 1 – Low

Tier 2 – Medium

Benchmark:

95% accurate for each level of disaggregation, or parity with SWBT DSL Retail, SWBT DSL Affiliate, or other CLECs, whichever is higher.

1.3. Measurement

Average Response Time for Missing Actual Loop Makeup Information

Definition:

The average response time in seconds or hours (depending on manner of response) from SWBT and return of actual loop makeup information missing from the original loop makeup response provided to the CLEC.

Exclusions:

None

Business Rules:

The clock starts on the date/time when the CLEC notifies SWBT that information is missing from the loop makeup information provided to the CLEC. Response time is accumulated on a disaggregated basis for DSL Loop Makeup Information provided manually and electronically. For responses provided electronically, the response time is measured only within the published hours of interface availability, as documented on the CLEC website.

Levels of Disaggregation:

- DSL Loop Makeup Information provided manually
- DSL Loop Makeup Information provided electronically

Calculation:	Report Structure:
$\Sigma[(\text{Query Response Date \& Time}) - (\text{Query Submission Date \& Time})] \div (\text{Number of Queries Submitted in Reporting Period})$	Reported on a CLEC, all CLECs, SWBT DSL Retail, and SWBT DSL affiliate basis by interface for EDI, DATAGATE, VERIGATE, or manually, depending on method of provision of actual loop makeup information.

Measurement Type:

Tier 1 – Low

Tier 2 – Medium

Benchmark:

Measurement	Fax/ LEX	EDI/Datagate	Verigate
Mechanized loop pre-qualification process	4 business hours	4 business hours[8]	4 business hours[9]
Manual Loop Makeup Information	3 business days	3 business days[10]	3 business days[11]

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[8] This interval is for CLEC requests for those central offices that have been inventoried. At the time that the electronic interface for loop makeup information is implemented, as ordered by the Commission, then the Benchmark should be 6.6 seconds. In the event that SWBT provides loop-prequalification in a shorter time frame, then the benchmark should be at the shorter interval.

[9] This interval is for CLEC requests for those central offices that have been inventoried. At the time that the electronic interface for loop makeup information is implemented, then the Benchmark should be 6.6 seconds. In the event that SWBT provides loop-prequalification in a shorter time frame, then the benchmark should be at the shorter interval.

Mechanized Loop Makeup Information	4 business hours	6.6 seconds[12]	6.6 seconds[13]

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[10] The time interval for providing manual loop makeup information should be shorter. The interval contained in this measurement is consistent with the Arbitration Award.

[11] *See* comment in Footnote 10.

[12] *See* DSL Appendix Pursuant to Arbitration Award in 20226/20272, Section 6.2.4. Once the electronic interfaced loop makeup system is implemented, the Benchmark should be equal to that already established for Request for Customer Service Record.

[13] *See* comment in Footnote 12.

1.4. Measurement

Average Response Time for Actual Loop Makeup Information in Response to Manual Loop Makeup Information Request

Definition:

The average response time in seconds or hours (depending on manner of response) from SWBT and return of actual loop makeup information to CLEC in response to a CLEC manual loop makeup information request for Central Offices that have not been inventoried.

Exclusions:

None

Business Rules:

The clock starts on the date/time when the request is received by SWBT and the clock stops on the date/time when SWBT has completed the transmission of the loop makeup information response to the CLEC (via LEX, Fax, electronic messaging, or any other manual method). Timestamps will be taken from receipt of the manual order based on fax receipt date and time stamp. Response time is based on the fax or LEX stamp sent by SWBT to CLEC containing loop makeup information.

Levels of Disaggregation:

- DSL Loop Makeup Information provided manually

Calculation:	Report Structure:
Σ[(Query Response Date & Time) - (Query Submission Date & Time)] ÷ (Number of Queries Submitted in Reporting Period)	Reported on a CLEC, all CLECs, SWBT DSL Retail, and SWBT DSL affiliate basis.

Measurement Type:

Tier 1 – Low
Tier 2 – Medium

Benchmark:

Measurement	Fax/LEX
Manual Loop Makeup Information	3 business days[14]

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[14] The time interval for providing manual loop makeup information should be shorter. The interval contained in this measurement is consistent with the Arbitration Award.

2. Measurement

Percent Responses Received within "X" seconds – OSS Interfaces

Definition:

The percent of responses completed in "x" seconds for pre-order interfaces (Verigate, DataGate, and EDI where the pre-order functionality is integrated) by function.

Exclusions:

See Measurement No. 1

Business Rules:

See Measurement No. 1

Levels of Disaggregation:

See Measurement No. 1

Calculation:	Report Structure:
(# of responses within each time interval ÷ total responses) * 100	Reported on a company basis by interface for EDI, DATAGATE and VERIGATE.

Measurement Type:

Tier 1 – Low
Tier 2 – Medium

Benchmark:

Measurement	EDI/Datagate	Verigate
Address Verification	90% in = 8.0 seconds 95% in = 12.0 seconds	80% in = 5.0 seconds 90% in = 7.0 seconds
Request For Telephone Number	90% in = 7.0 seconds 95% in = 9.5 seconds	80% in = 4.0 seconds 90% in = 6.0 seconds
Request For Customer Service Record (CSR)	90% in = 8.0 seconds 95% in = 13 seconds	80% in = 7.0 seconds 90% in = 10.0 seconds
Service Availability	90% in = 12.0 seconds 95% in = 16.0 seconds	80% in = 11.0 seconds 90% in = 13.0 seconds
Service Appointment Scheduling (Due Date)	90% in = 1 seconds 95% in = 2.0 seconds	80% in = 2.0 seconds 90% in = 3.0 seconds
Dispatch Required	90% in = 15.0 seconds 95% in = 25.0 seconds	80% in = 17.0 seconds 90% in = 19.0 seconds
PIC	90% in = 39 seconds 95% in = 60 seconds	To be determined at six month revision period
Mechanized Loop Pre-qualification	90% in = 8.0 seconds 95% in = 13 seconds	80% in = 7.0 seconds 90% in = 10.0 seconds
Manual Loop Makeup Information	98% in = 3 business days[15]	98% in = 3 business days[16]

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[15] The time interval for providing manual loop makeup information should be shorter. The interval contained in this measurement is consistent with the Arbitration Award.

| Mechanized Actual Loop Makeup Information | 90% in = 8.0 seconds | 80% in = 7.0 seconds |
| | 95% in = 13 seconds | 90% in = 10.0 seconds |

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4. Measurement
OSS Interface Availability

Definition:
Percent of time OSS interface is available compared to scheduled availability.

Exclusions:
None

Business Rules:
The total "number of hours functionality to be available" is the cumulative number of hours (by date and time on a 24 hour clock) over which SWBT plans to offer and support CLEC access to SWBT's operational support systems (OSS) functionality during the reporting period. "Hours Functionality is Available" is the actual number of hours, during scheduled available time, that the SWBT interface is capable of accepting or receiving CLEC transactions or data files for processing through the interface and supporting operational support systems (OSS). The actual time available is divided by the scheduled time available and then multiplied by 100 to produce the "Percent system availability" measure. SWBT will not schedule normal maintenance during business hours (8:00 a.m. to 5:30 p.m. Monday through Friday). When interfaces experience partial unavailability, an availability factor is applied to the calculation of downtime. This factor is stated as a percentage and represents the impact to the CLEC. Determination of the availability factor is governed by SWBT's Availability Team on a case by case basis. SWBT's availability team shall provide to CLECs the information supporting the use of any availability factor multiplier used in reporting this measurement. SWBT shall calculate the availability time rounded to the nearest minute.

Levels of Disaggregation:
• EASE reported for Geographic Regions • EDI reported by protocol

Calculation:	Report Structure:

[(Hours functionality is available during the scheduled available hours) $\div$ Scheduled system available hours)] * 100	Reported on an aggregate CLEC basis by interface, e.g. EASE, DATAGATE, VERIGATE, LEX, EDI and TOOLBAR. For DSL, should be reported for LFACs, PREMIS, LMOS, LEISLEAD, TIRKS, SORD, and any other database that CLEC, SWBT DSL Retail, or SWBT DSL Affiliate has access .[17] The RAF will be reported on an individual CLECs basis.

Measurement Type:

Tier 1 – None
Tier 2 – High

Benchmark:

99.5%. The critical Z allowance does not apply on this measurement.

NOTE: Rhythms and Covad believe that a benchmark needs to be created for access to all databases, *etc.*, as allowed by the Arbitration Award, to be included in this measurement. However, neither Rhythms nor Covad have access or a list of those databases or pertinent electronic databases. Until such time as SWBT provides that information, Rhythms and Covad cannot complete this PM proposal.

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[17] Consistent with the Arbitration Award and Rhythms/SWBT DSL Appendix, § 6.1.1 and Covad/SWBT DSL Appendix DSL, § 5.1. Rhythms and Covad propose that a list of all "manual, computerized, and automated systems, together with associated business processes and the up-to-date data maintained in those systems" be included in this Measure. SWBT should be ordered to produce a list that is subject to verification by the parties. Until such time as that list is provided, however, the additional databases listed herein will serve as the minimum level of measurement. This measurement, however, should not be completed or approved until SWBT has provided the list and is verified by the parties and the Commission.

5. Measurement:
Percent Firm Order Confirmations (FOCs) Returned[18]

Definition:
Percent of FOCs returned within a specified time frame from receipt of a complete and accurate service request to return of confirmation to CLEC.

Exclusions:
•   Rejected (manual and electronic) orders. •   For DSL Orders – Orders rejected for incomplete or incorrect LSR •   For DSL Orders – denied orders for pair gain •   SWBT only Disconnect orders. •   Orders involving major projects mutually agreed upon by CLECs and SWBT. •   Upon implementation of Performance Measurement 94, LNP and LNP With Loop will be excluded from this measure.

Business Rules:
FOC business rules are established to reflect the Local Service Center (LSC) normal hours of operation, which include Monday through Friday, 8:00 a.m.-5:30p.m, excluding holidays and weekends. If the start time is outside of normal business hours, then the start date/time is set to 8:00 a.m. on the next business day. Example: If the request is received Monday through Friday between 8:00 a.m. to 5:30 p.m.; the valid start time will be Monday through Friday between 8:00 a.m. to 5:30 p.m. If the actual request is received Monday through Thursday after 5:00 p.m. and before 8:00 a.m. the next day; the valid start time will be the next business day at 8:00 a.m. If the actual request is received Friday after 5:30 p.m. and before 8:00 a.m. Monday; the valid start time will be at 8:00 a.m. Monday. If the request is received on a holiday (anytime); the valid start time will be the next business day at 8:00 a.m. The returned confirmation to the CLEC will establish the actual end date/time. Provisions are established within the DSS reporting systems to accommodate situations when the LSC works holidays, weekends, and when requests are received outside normal working hours. For UNE Loop and Port combinations, orders requiring N, C, and D orders; the FOC is sent back at the time the last order that establishes service is distributed In the event of a post-FOC reject, the originally recorded duration to return the first FOC will not be included in the Measurement No. 5 reported date.

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[18] The DOJ noted that SWBT did not include DSL FOCs in its data submitted in support of its 271 application. DOJ Evaluation at 13-14. Rhythms and Covad have experienced significant delays in receiving FOCs, primarily due to the manner in which SWBT implements multiple rejects on LSRs.

LEX/EDI

For LEX and EDI originated LSRs, the start date and time is the receive date and time that is automatically populated by the interface (EDI or LEX) with the system date and time.. The end date and time is recorded by both LEX and EDI and reflect the actual date and time the FOC is **available** to the CLEC. This data is extracted daily from LEX and EDI and passed to the DSS (Decision Support System), where the end date and time are populated and are used to calculate the FOC measurements. For LSRs where FOC times are negotiated with the CLEC, the ITRAK entry on the SORD service order is used in the calculation. The request type from the LSR and the Class of Service tables are used to report the LSRs in the various levels of disaggregation. The Class of Service tables are based on the Universal Service Order practice.

VERBAL or MANUAL REQUESTS

Manual service order requests are those initiated by the CLEC either by telephone, fax, or other manual methods (i.e. courier). The receive date and times are recorded and input on the SM-FID on each service order in SORD for each FOC opportunity. The end times are the actual dates and times the paper faxes are sent back to the CLEC. Fax end times are recorded and input into the DSS systems via an internal Web application. Each FOC opportunity is dynamically established on the Web application via our interface to SORD. The LSC must provide an end date and time for each entry, which depicts the date and time the FOC was actually faxed back to the CLEC. If a CLEC elects to accept an on line FOC and does not require a paper fax the FOC information is provided over the phone. In these instances, the order distribution time is used in the FOC calculation on the related SORD service order to the appropriate SM-FID entry. These scenarios are identified by data populated on the ITRAK-FID of the service order. The ITRAK-FID is also used when FOC times are negotiated with the CLEC. The LSC will populate the ITRAK-FID with certain pre-established data entries that are used in the FOC calculation.

Levels of Disaggregation:

Manually submitted:
- Simple Res. And Bus. < 24 Hours
- Complex Business (1-200 Lines) < 24 Hours
- Complex Business (>200 Lines) < 48 Hours
- UNE Loop (1-49 Loops) < 24 Hours
- UNE Loop (> 50 Loops) < 48 Hours
- Switch Ports < 24 Hours
- DSL Loop Makeup and Order < 3 business days (LM Info) plus 5 business hours for order[19]
- DSL Supplemental Order < 24 hours
- DSL Loop Order where loop makeup information already provided to CLEC or loop prequalification is "green" < 24 hours

Electronically submitted via LEX or EDI:
- Simple Res. And Bus. < 5 Hours
- DSL Loop Makeup and Order< 4 hours[20]
- DSL Supplemental Order < 4 hours
- DSL Loop Prequalification < 4 hours
- DSL Loop Order where loop makeup information already provided to CLEC or loop prequalification is "green"< 4 hours
- Complex Business (1-200 Lines) < 24 Hours
- Complex Business (>200 Lines) < 48 Hours
- UNE Loop (1-49 Loops) < 5 Hours
- UNE Loop (> 50 Loops) < 48 Hours
- Switch Ports < 5 Hours

Calculation:	Report Structure:
(# FOCs returned within ~~"x" hours~~ specified interval÷ total FOCs sent) * 100	Reported for CLEC, ~~and~~ all CLECs, SWBT DSL Retail, and SWBT DSL Affiliate. This includes mechanized from EDI and LEX and manual (FAX, electronic messages, or phone orders).

Measurement Type:

Tier 1 – Low
Tier 2 – Medium

Benchmark:

All Res and Bus 95% / Complex Bus 94% / UNE Loop (1-49) 95% / UNE Loop (>50) 94% / Switch Ports 95%, the Average for the remainder of each measure

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[19] This category is for a one-step process in which the Loop Makeup Info and Order are contained in the same LSR.
[20] This category is the one-step process described in Footnote 19.

disaggregated shall not exceed 20% of the established benchmark. For DSL Loop and Loop Makeup Information categories – 95%, or parity with SWBT DSL Retail, SWBT DSL Affiliate, or other CLECs, whichever is higher.